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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to:

Electrograph Sys. v. Hitachi, Ltd., No. 11-cv-01656;
Electrograph Sys., Inc. v. Technicolor SA, No. 13-cv-05724;
Siegel v. Hitachi, Ltd., No. 11-cv-05502;
Siegel v. Technicolor SA, No. 13-cv-05261;
Best Buy Co. v. Hitachi, Ltd., No. 11-cv-05513;
Best Buy Co. v. Technicolor SA, No. 13-cv-05264;
Interbond Corp. of Am. v. Hitachi, Ltd., No. 11-cv-06275;

Master File No. 3:07-cv-05944-SC

MDL No. 1917

**DECLARATION OF MATTHEW D.
KENT IN SUPPORT OF DELL INC.
AND DELL PRODUCTS L.P.'S
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL**

1 *Interbond Corp. of Am. v. Technicolor SA.*, No. 13-cv-
2 05727;
3 *Office Depot, Inc. v. Hitachi Ltd.*, No. 11-cv-06276;
4 *Office Depot, Inc. v. Technicolor SA*, No. 13-cv-5726;
5 *CompuCom Sys., Inc. v. Hitachi, Ltd.*, No. 11-cv-06396;
6 *P.C. Richard & Son Long Island Corp. v. Hitachi, Ltd.*,
7 No. 12-cv-02648;
8 *P.C. Richard & Son Long Island Corp. v. Technicolor*
9 *SA.*, No. 13-cv-05725;
10 *Schultze Agency Servs., LLC v. Hitachi, Ltd.*, No. 12-cv-
11 02649;
12 *Tech Data Corp. v. Hitachi, Ltd.*, No. 13-cv-00157;
13 *Dell Inc. and Dell Products L.P., v. Hitachi, Ltd.*, No.
14 13-cv-02171;
15 *Sears, Roebuck and Co. and Kmart Corp. v. Technicolor*
16 *SA*, No. 13-cv-05262;
17 *Sears, Roebuck and Co. and Kmart Corp. v. Chunghwa*
18 *Picture Tubes, Ltd.*, No. 11-cv-05514;
19 *Sharp Elecs. Corp. v. Hitachi, Ltd.*, No. 13-cv-1173 SC;
20 *Sharp Elecs. Corp. v. Koninklijke Philips Elecs., N.V.*,
21 No. 13-cv-2776 SC;
22 *ViewSonic Corp. v. Chunghwa Picture Tubes, Ltd.*, No.
23 14-02510;
24 *All Indirect Purchaser Actions.*

1 I, **MATTHEW D. KENT**, declare as follows:

2 **1.** I am a Senior Associate with the law firm of Alston & Bird LLP, counsel for Plaintiffs
3 Dell Inc. and Dell Products L.P. (collectively, “Dell”) in the above-captioned action currently pending
4 in the U.S. District Court for the Northern District of California. I submit this declaration in support of
5 Dell’s Administrative Motion to File Documents Under Seal, related to Plaintiffs’ Opposition to
6 Koninklijke Philips N.V.’s Motion for Summary Judgment and Plaintiffs’ Opposition to Philips
7 Electronics North America Corporation’s, Philip Taiwan Limited’s, and Philips do Brasil Ltda.’s
8 Motion for Partial Summary Judgment (collectively the “Philips Opposition Briefs”). I have personal
9 knowledge of the facts stated herein, and I could and would competently testify thereto if called as a
10 witness.

11 **2.** I am a member in good standing of the State Bar of Georgia and am admitted to practice
12 before the U.S. District Court for the Northern District of Georgia. I have also been admitted to this
13 Court *pro hac vice* as counsel for Dell pursuant to the Court’s Pretrial Order No. 1 in the MDL
14 Proceeding.

15 **3.** Pursuant to Civil Local Rules 7-11 and 79-5, and in accordance with this Court’s
16 General Order No. 62, effective May 10, 2010, Dell, by and through its counsel, respectfully requests
17 an Order permitting it to file under seal portions of the Philips Opposition Briefs and all exhibits to the
18 Declaration of Debra D. Bernstein in Support of the Philips Opposition Briefs (“Bernstein
19 Declaration”).

20 **4. Exhibit 1** to the Bernstein Declaration are excerpts from the November 5, 2014,
21 deposition transcript of Royal Philips 30(b)(6) Representative Frans Spaargaren, which
22 Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to
23 the Protective Order.

24 **5. Exhibit 2** to the Bernstein Declaration is a copy of a document bearing bates numbers
25 PNV0053292–PNV0053317, which Defendants have designated as “Confidential”
26 and/or “Highly Confidential” pursuant to the Protective Order.

27 **6. Exhibit 3** to the Bernstein Declaration is a copy of a document bearing bates numbers
28

LPD-NL00018396–LPD-NL00018473, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

7. **Exhibit 4** to the Bernstein Declaration is a copy of a document bearing bates number PHLP-CRT-071832, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

8. **Exhibit 5** to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-104383–PHLP-CRT-104511, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

9. **Exhibit 6** to the Bernstein Declaration is a copy of the Objections and Responses of Defendant Koninklijke Philips N.V. to DAP’s First Set of Interrogatories, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

10. **Exhibit 7** to the Bernstein Declaration are excerpts from the July 31-August 1, 2012 deposition transcript of Royal Philips 30(b)(6) Representative Roger De Moor, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

11. **Exhibit 8** to the Bernstein Declaration is a copy of a document bearing bates numbers DELL-CRT-00095367–DELL-CRT-00095376, which Dell has designated as “Highly Confidential” pursuant to the Protective Order. Exhibit 8 is a confidential contract between Dell and Royal Philips. This contract contains sensitive, confidential Dell information regarding Dell’s procurement strategy as well as confidential pricing-relating information. The public disclosure of Exhibit 8 would be harmful to Dell.

12. **Exhibit 9** to the Bernstein Declaration is a copy of a document bearing bates numbers EIN0051737–EIN0051744, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

13. **Exhibit 10** to the Bernstein Declaration is a copy of a document bearing bates numbers PENAC-DOJ-0000577–PENAC-DOJ-0000594, which Defendants have designated as

“Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

14. **Exhibit 11** to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-026300–PHLP-CRT-026301, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

15. **Exhibit 12** to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-026296–PHLP-CRT-026299, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

16. **Exhibit 13** to the Bernstein Declaration are excerpts from the transcript of the December 12-13, 2013 deposition of Jim Smith, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

17. **Exhibit 14** to the Bernstein Declaration are excerpts from the transcript of the October 8-9, 2014, deposition of Jan De Lombaerde, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

18. **Exhibit 15** to the Bernstein Declaration are excerpts from the transcript of the February 19-21, 2013, deposition of Chih Chun Liu, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

19. **Exhibit 16** to the Bernstein Declaration is a copy of a document bearing bates numbers LPD-NL00164354–LPD-NL00164438, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

20. **Exhibit 17** to the Bernstein Declaration is a copy of the Supplemental Exhibit A to Various DAP’s Interrogatory Responses, which Plaintiffs have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order because it contains express references to documents/information Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

21. **Exhibit 18** to the Bernstein Declaration is a copy of a document bearing bates numbers CHU00028760–CHU00028762, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to

the Protective Order.

22. Exhibit 19 to the Bernstein Declaration is a copy of a document bearing bates numbers CHU00028674–CHU00028676, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

23. Exhibit 20 to the Bernstein Declaration are excerpts from the transcript of the June 16, 2013 deposition of Pil Jae Lee, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

24. Exhibit 21 to the Bernstein Declaration is a copy of a document bearing bates number SDCRT-0086690, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

25. Exhibit 22 to the Bernstein Declaration is a copy of a document bearing bates numbers SDCRT-0086675–SDCRT-0086681, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

26. Exhibit 23 to the Bernstein Declaration are copies of documents bearing bates numbers CHU00030787–CHU00030794; CHU00030835–CHU00030838; CHU00021268–CHU00021271; CHU00029163–CHU00029170; CHU00030979–CHU00030984; CHU00029131–CHU00029137; CHU00029105–CHU00029107, as well as certified translations of the same to the extent the document is a foreign language document, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

27. Exhibit 24 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-109589–PHLP-CRT-109590, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

28. Exhibit 25 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-131584–PHLP-CRT-131590, which Defendants have designated as

“Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

29. Exhibit 26 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-130656–PHLP-CRT-130661, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

30. Exhibit 27 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-131901–PHLP-CRT-131906, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

31. Exhibit 28 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-131576–PHLP-CRT-131579, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

32. Exhibit 29 to the Bernstein Declaration is a copy of a document bearing bates numbers CHU00029138–CHU00029143, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

33. Exhibit 30 to the Bernstein Declaration is a copy of a document bearing bates numbers CHU00030995–CHU00030997, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

34. Exhibit 31 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-082372–PHLP-CRT-082374, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

35. Exhibit 32 to the Bernstein Declaration are excerpts from the transcript of the January 30-31, 2014, deposition of Patrick Canavan, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

36. Exhibit 33 to the Bernstein Declaration is a copy of a document bearing bates numbers SDCRT-0002506–SDCRT-0002510, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential”

pursuant to the Protective Order.

- 37. Exhibit 34** to the Bernstein Declaration are copies of documents bearing bates numbers JLJ-00003899 and TSB-CRT-00035310, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 38. Exhibit 35** to the Bernstein Declaration is a copy of a document bearing bates numbers SDCRT-0002562, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 39. Exhibit 36** to the Bernstein Declaration is a copy of a document bearing bates numbers EIN0012882–EIN0012935, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 40. Exhibit 37** to the Bernstein Declaration is a copy of a document bearing bates numbers EIN104437–EIN104506, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 41. Exhibit 38** to the Bernstein Declaration is a copy of a document bearing bates numbers EIN0003750–EIN0003798, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 42. Exhibit 39** to the Bernstein Declaration is a copy of a document bearing bates number PTC-00006474, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 43. Exhibit 40** to the Bernstein Declaration is a copy of a document bearing bates numbers CHU00030701–CHU00030704, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 44. Exhibit 41** to the Bernstein Declaration is a copy of a document bearing bates number CHU00021272, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

- 1 **45. Exhibit 42** to the Bernstein Declaration is a copy of a document bearing bates numbers
2 CHU00735558, as well as a certified translation of the same, which Defendants have
3 designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective
4 Order.
- 5 **46. Exhibit 43** to the Bernstein Declaration is a copy of a document bearing bates numbers
6 PHLP-CRT-144478–PHLP-CRT-144585, which Defendants have designated as
7 “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 8 **47. Exhibit 44** to the Bernstein Declaration are excerpts from the transcript of the February
9 22, 25-26, 2013 deposition of Sheng-Jen Yang, which Defendants have designated as
10 “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 11 **48. Exhibit 45** to the Bernstein Declaration is a copy of a document bearing bates numbers
12 LGE00092012–LGE00092018, which Defendants have designated as “Confidential”
13 and/or “Highly Confidential” pursuant to the Protective Order.
- 14 **49. Exhibit 46** to the Bernstein Declaration is a copy of a document bearing bates numbers
15 PNV0152948–PNV0152949, which Defendants have designated as “Confidential”
16 and/or “Highly Confidential” pursuant to the Protective Order.
- 17 **50. Exhibit 47** to the Bernstein Declaration is a copy of a document bearing bates numbers
18 PHLP-CRT-103886–PHLP-CRT-103888, which Defendants have designated as
19 “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 20 **51. Exhibit 48** to the Bernstein Declaration is a copy of a document bearing bates numbers
21 PHLP-CRT-052479, which Defendants have designated as “Confidential” and/or
22 “Highly Confidential” pursuant to the Protective Order.
- 23 **52. Exhibit 49** to the Bernstein Declaration is a copy of a document bearing bates numbers
24 PHLP-CRT-160819–PHLP-CRT-160822, which Defendants have designated as
25 “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.
- 26 **53. Exhibit 50** to the Bernstein Declaration is a copy of a document bearing bates numbers
27 PHLP-CRT-1000–PHLP-CRT-1010, which Defendants have designated as
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“Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

54. Exhibit 51 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-148795–PHLP-CRT-148796, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

55. Exhibit 52 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-048786–PHLP-CRT-048787, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

56. Exhibit 53 to the Bernstein Declaration are excerpts from the transcript of the July 1-3, 2013, deposition of Yasuki Yamamoto, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

57. Exhibit 54 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-014272–PHLP-CRT-014274, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

58. Exhibit 55 to the Bernstein Declaration is a copy of a document bearing bates number PHLP-CRT-052781, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

59. Exhibit 56 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-149827–PHLP-CRT-149829, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

60. Exhibit 57 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-163389–PHLP-CRT-163391, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

61. Exhibit 58 to the Bernstein Declaration contains copies of two documents bearing bates numbers PHLP-CRT-159385 and PHLP-CRT-159393, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

62. Exhibit 59 to the Bernstein Declaration is a copy of a document bearing bates numbers

PHLP-CRT-156458–PHLP-CRT-156460, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

63. Exhibit 60 to the Bernstein Declaration is a copy of a document bearing bates number PHLP-CRT-158085–PHLP-CRT-158086, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

64. Exhibit 61 to the Bernstein Declaration is a copy of a document bearing bates numbers MTPD-0521744–MTPD-0521748, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

65. Exhibit 62 to the Bernstein Declaration is a copy of a document bearing bates numbers LPD-NL00031186–LPD-NL00031206, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

66. Exhibit 63 to the Bernstein Declaration is a copy of a document bearing bates numbers CHU00578883–CHU00578885, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

67. Exhibit 64 to the Bernstein Declaration is a copy of the Supplementary Objections and Responses of Defendant Philips Electronics North America Corporation to Dell’s First Set of Interrogatories, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

68. Exhibit 65 to the Bernstein Declaration are copies of documents bearing bates numbers PNV0121635–PNV0121640; EIN0000100; PHLP-CRT-082985, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

69. Exhibit 66 to the Bernstein Declaration is a copy of a document bearing bates numbers SDCRT-0002488–SDCRT-0002489, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential”

pursuant to the Protective Order.

70. Exhibit 67 to the Bernstein Declaration is a copy of a document bearing bates numbers CHU00031105–CHU00031106, as well as a certified translation of the same, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

71. Exhibit 68 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-089651–PHLP-CRT-089652, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

72. Exhibit 69 to the Bernstein Declaration is a copy of a document bearing bates number PHLP-CRT-073314, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

73. Exhibit 70 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-160267–PHLP-CRT-160268, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

74. Exhibit 71 to the Bernstein Declaration is a copy of a document bearing bates numbers PHLP-CRT-094860–PHLP-CRT-094861, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

75. Exhibit 72 to the Bernstein Declaration is a copy of a document bearing bates number PHLP-CRT-161825, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

76. Exhibit 73 to the Bernstein Declaration is a copy of a document bearing bates number PHLP-CRT-154722–PHLP-CRT-154723, which Defendants have designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order.

77. Exhibit 74 to the Bernstein Declaration is a copy of the April 15, 2014 Expert Report of Mohan Rao, which Dell has designated as “Confidential” and/or “Highly Confidential” pursuant to the Protective Order. Exhibit 74 contains confidential, non-public information regarding Dell’s business practices and Dell financial information. This

1 includes the identification of Dell's suppliers and express references to the financial
2 terms of certain confidential agreements with suppliers. Dell considers this information
3 to be confidential and sensitive business information, the public disclosure of which
4 would be harmful to Dell. In addition, Exhibit 74 contains excerpts from or references
5 to materials designated by other parties as "Confidential" or "Highly Confidential"
6 under a Protective Order.

7 **78. Exhibit 75** to the Bernstein Declaration is a copy of the April 15, 2014 Expert Report of
8 Janet S. Netz, which the Indirect Purchaser Plaintiffs have designated as "Confidential"
9 and/or "Highly Confidential" pursuant to the Protective Order.

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11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed on December 22, 2014, in Atlanta, Georgia.

14
15 By: /s/ Matthew D. Kent
16 Matthew D. Kent, Esq. (GA Bar No. 425262)
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23 *Attorney for Plaintiffs Dell Inc. and Dell Products L.P*
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